

REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

No claims are requested to be cancelled, amended, or added. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

In the present Office Action, each of the rejections of the pending claims over the prior art as set forth in the Office Action mailed on May 5, 2005 has been maintained. In particular, claims 1-3, 7-16, 18, 20-23, 27-36, 38, 40-42, and 45-46 remain rejected under 35 U.S.C. § 103(a) as being unpatentable over Eck (U.S. Publication No. 2002/0129059) in view of Myllymaki ("Effective Web Data Extraction with Standard XML Technologies"), and claims 4-6, 24-26, 43-44, and 47-48 remain rejected by the combination of Eck and Myllymaki and further in view of Webber (U.S. Patent No. 6,418,400), Huang (U.S. Publication No. 2002/0147748), or De La Hueraga (U.S. Patent No. 6,516,321).

Claim 1 recites that a method for translating between an XML-type document and a first type of document, comprises generating a data model for the XML-type document based on an XML data source, generating a data model for the first type of document based on the XML data source, creating mapping rules between the data model for the XML-type document and the data model for the first type of document, and storing the data model for the XML-type document, the data model for the first type of document, and the mapping rules in a storage device. The method further comprises verifying that the XML-type document (i.e., the starting document) is well-formed based upon the data model for the XML-type document.

In the Response to Arguments on page 11 of the present Office Action, it was asserted that Myllymaki does indeed teach verifying that an XML-type document is well-formed based upon a data model for the XML-type document. In particular, it was asserted that since Myllymaki teaches that HTML content is translated into well-formed XML syntax in order to help subsequent data extraction steps or procedures, it would have been obvious to one of ordinary skill in the art at the time of the invention to conclude that the data translated into

well-formed XML syntax has been verified to contain well-formed XML syntax. It was further asserted that the motivation for verifying that the data translated into well-formed XML syntax was actually well-formed would have been to help in subsequent extraction steps.

Applicant respectfully disagrees with these assertions. First, there is nothing in either Eck or Myllymaki that specifically discloses or suggests a step of verifying whether a document is well-formed. Accordingly, absent the disclosure from the present application and the claim language itself, there is nothing from the cited references that would disclose or suggest to one of ordinary skill in the art to verify that the document is well-formed.

Myllymaki does disclose that the first step in data extraction is to translate HTML content to a well-formed XML syntax. This translation is performed regardless of whether the original HTML content is ill-formed. Since the translation to the well-formed XML syntax is made regardless of the propriety of the HTML content, Myllymaki clearly fails to disclose or suggest verifying the HTML content is well-formed. In other words, if the HTML content was well-formed already, then there is no need to translate the content to a well-formed XML syntax.

Further, Myllymaki discloses that the translation is effected by passing the original HTML page through a filter that fixes any broken syntax and produces well-formed HTML, such as by using existing toolkits. Since the output of the translation is self-evidently a well-formed document, there is similarly no disclosure or suggestion to verify that the result of the translation is well-formed. In other words, since it is known that the result of the translation is well-formed, there is no reason to subsequently verify that it is indeed well-formed. Accordingly, Myllymaki fails to disclose or suggest verifying that the HTML content is well-formed and also fails to disclose or suggest verifying that the result of the translation is well-formed.

Myllymaki also fails to disclose or suggest verifying that the XML-type document is well-formed based upon the data model for the XML-type document, which is generated for the XML-type document based on an XML data source. Rather, Myllymaki simply discloses that the translation fixes the syntax and produces well-formed HTML, but discloses nothing

about verifying the data based on the data model for the data generated from an XML data source.

For all of these reasons, the combination of Eck and Myllymaki fails to disclose or suggest verifying that the XML-type document is well-formed based upon the data model for the XML-type document, as recited in claim 1. Accordingly, claim 1 is patentably distinguishable from the combination of Eck and Myllymaki.

Claims 2-3, 7-16, 18, and 20 are patentably distinguishable from the combination of Eck and Myllymaki by virtue of their dependence from claim 1, as well as their additional recitations. Claims 21, 41, and 45 are patentably distinguishable from the combination of Eck and Myllymaki for reasons analogous to claim 1. Claims 22-23, 27-36, 38, 40, 42, and 46 are patentably distinguishable from the combination of Eck and Myllymaki by virtue of their dependence from claim 21, 41, or 45, as well as their additional recitations.

The remaining claims 4-6, 24-26, 43-44, and 47-48 were rejected by the combination of Eck and Myllymaki and further in view of Webber (U.S. Patent No. 6,418,400), Huang (U.S. Publication No. 2002/0147748), or De La Hueraga (U.S. Patent No. 6,516,321). Like Eck and Myllymaki, none of these references discloses or suggests verifying that the XML-type document is well formed based upon the data model for the XML type document. Accordingly, even if combinable, claims 4-6, 24-26, 43-44, and 47-48 are patentably distinguishable from the asserted combinations by virtue of their dependency from claims 1, 21, 41, and 45, respectively, as well as their additional recitations.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or

even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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